

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
as representative of : Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)
Debtors.¹ :
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**AMENDED² INFORMATIVE MOTION OF OFFICIAL COMMITTEE
REGARDING NOVEMBER 15-16, 2017, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding the Location and Procedures for Attendance, Participation and Observation of the November 15-16, 2017 Omnibus Hearing*, dated October 26, 2017 [Docket No. 1545] (the “Scheduling Order”) and respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² This informative motion has been further amended to add in paragraph 1(f) below the Committee’s motion to be heard at the November 21 hearing on pending motions to dismiss.

1. Luc A. Despins of Paul Hastings LLP will appear in person on behalf of the Committee at the November Omnibus Hearing (as defined in the Scheduling Order) in Courtroom 26B of the United States District Court for the Southern District of New York, and address, as necessary, the following matters:

- (a) *Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis* [Docket No. 706];
- (b) *Motion of National Public Finance Guarantee Corporation for Entry of An Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery* [Docket No. 1177];
 - (i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004* [Docket No. 1344];
 - (ii) *Limited Joinder of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III)*

Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1603];

- (c) *Joint Motion by the Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp., Assured guaranty Municipal Corp., and the Mutual Fund Group for Order Authorizing Rule 2004 Examination [Docket No. 1178];*
 - (i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1344];*
 - (ii) *Limited Joinder of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1603];*
- (d) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1283];*

(i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1344];*

(ii) *Limited Joinder of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1603];*

(e) *Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria [Docket No. 1514];*

(i) *Objection of Official Committee of Unsecured Creditors Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria [Docket No. 1602];*

(f) *Urgent Motion of Intervenor Official Committee of Unsecured Creditors to Be Heard at November 21, 2017 Hearings in Monoline/HTA Adversary Proceedings with Respect to Pending Motions to Dismiss* [Docket No. 90 in Adv. Proc. No. 17-155; Docket No. 92 in Adv. Proc. No. 17-156; and Docket No. 104 in Adv. Proc. No. 17-159];

(g) Any objections or responses to any of the foregoing motions; and

(h) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

2. The Committee anticipates that a total of three representatives (two attorneys and one financial advisor) will attend the November Omnibus Hearing at the United States District Court for the Southern District of New York.

3. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will attend, on behalf of the Committee, the November Omnibus Hearing at the United States District Court for the District of Puerto Rico.

[Remainder of page intentionally left blank.]

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: November 7, 2017

/s/ G. Alexander Bongartz

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- and -

/s/ Juan J. Casillas Ayala

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